

REMARKS

In reply to the final Office Action of August 29, 2006, applicant submits the following remarks.

Claim Amendments

Claims 1, 6, 11, 16, 21 and 28 are amended to recite “at each pixel there is a conducting polymer region of the plurality of substantially electrically isolated conducting polymer regions that is electrically isolated from each conducting polymer region at each adjacent pixel”. Support for the amendment can be found at least in FIG. 2, and on page 5, lines 1-22 of applicant’s specification as filed.

Section 102 Rejections

All of the pending claims are rejected as allegedly anticipated by Hsu. Applicant respectfully disagrees.

Hsu is directed to a formulation for a conductive polymer, where a layer of the conductive polymer acts as a buffer layer in a light-emitting device (paragraph 0011). In forming the light-emitting device, an anode and conductive polymer layer of a light emitting diode can be patterned (paragraph 0021). “The layers can be applied in a pattern by . . . positioning a patterned mask or photoresist . . . prior to applying the first electrical contact layer material. Alternatively, the layers can be patterned using, for example, a photoresist and wet chemical etching.” *Id.* In the following paragraph, Hsu states “in order to prevent cross-talk between lines or pixels of the patterned anode, electrical conductivity of the buffer layers should be as low as possible without jeopardizing the light emission properties of the device” (paragraph 0022).

Hsu describes a method of forming an anode and a conductive polymer layer using the same mask or photoresist. Hsu also requires that the electrical conductivity of the buffer layers should be as low as possible to prevent cross-talk between lines or pixels of the patterned anode. These two teachings suggest that a layer of conductive polymer of one pixel contacts or is the

same as a layer of the conductive polymer of an adjacent pixel, such as when the anode and the conductive polymer layer are both patterned into strips. If the conductive polymer at adjacent pixels is not in a contiguous layer, there would be no need to use a buffer layer comprising the conductive polymer that has an electrical conductivity that is as low as possible to prevent cross-talk. Therefore, not only does Hsu fail to specifically teach a device where at each pixel there is a conducting polymer region of the plurality of substantially electrically isolated conducting polymer regions that is electrically isolated from each conducting polymer region at each adjacent pixel, Hsu rather suggests the opposite. Hsu suggests a buffer layer that includes electrically conducting polymer, where the buffer layer is continuous between at least two adjacent pixels, if not between at least two adjacent lines, and is electrically conductive to allow for light emission when a pixel is activated.

The Examiner argues that “the limitation ‘substantially electrically isolated’ in the present claims does not add any patentable weight to the present claims. The term ‘substantially’ is a relative term and does not provide a standard for the isolation between the conducting regions at adjacent pixels.” (Office Action, page 3, section 8). The applicant respectfully disagrees. Applicant points out that the Federal Circuit has repeatedly conferred meaning to the term “substantially”, finding that the term is not indefinite. *See, e.g., York Products, Inc. v. Central Tractor Farm & Family Center*, 99 F.3d 1568 (Fed. Cir. 1996), *Verve, LLC v. Crane Cams, Inc.*, 311 F. 3d 1116 (Fed. Cir. 2002), *Deering Precision Instruments, L.L.C. v. Vector Distribution Systems, Inc.*, 347 F.3d 1314 (Fed. Circ. 2003).

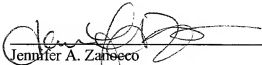
Each of the independent limitations requires the limitation at each pixel there is a conducting polymer region of the plurality of substantially electrically isolated conducting polymer regions that is electrically isolated from each conducting polymer region at each adjacent pixel. Because Hsu fails to teach or suggest this limitation, applicant submits that the claims are not anticipated by Hsu.

Withdrawal of the anticipation rejection is requested.

No fee is believed to be due. If, however, there are any charges or credits, please apply them to Deposit Account No. 06-1050.

Respectfully submitted,

Date: October 26, 2006


Jennifer A. Zansco
Reg. No. 54,563

Customer No. 26181
Fish & Richardson P.C.
Telephone: (650) 839-5070
Facsimile: (650) 839-5071